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*Attorney for Jaclyn R. Hafter, as Parent
of the Hafter Children*

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

RELIASTAR LIFE INSURANCE CO.,

Plaintiff,

v.

JACLYN R. HAFTER, INDIVIDUALLY
AND AS TRUSTEE OF THE HAFTER
FAMILY TRUST DATED JUNE 11, 2011,
BRANDON PHILLIPS, AS TRUSTEE OF
THE JACOB HAFTER TRUST DATED
APRIL 17, 2018, THE UNITED STATES OF
AMERICA, ACTING THROUGH THE
INTERNAL REVENUE SERVICE, AND
DOES 1-5

Defendants.

Case No. 2:18-cv-01166-APG-NJK

STIPULATION AND ORDER

COMES NOW, Jaclyn Hafter, individually and as Trustee of the Hafter Family Trust, dated June 12th, 2011; Brandon Phillips, as Trustee of the Jacob Hafter Trust, dated April 17, 2018; and United States of America, on behalf of the Internal Revenue Service, (the "Parties") by and through undersigned counsel, and hereby submit the following Stipulation and Order.

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1 The Parties hereby stipulate as follows

2 1. On February 11, 2018, Jaclyn Hafter (“Jaclyn”), on behalf of her minor children,
3 G.H., J.H., A.H., and S.H. filed her Request for Order Shortening Time; and Motion to Intervene
4 as Parent of Minor Children, and Motion for Release of Funds for the Benefit of Minor Children
5 (the “Motion”).

6 2. Within her Motion, Jaclyn requested that this Court: (i) permit her to intervene on
7 behalf of her minor children; and (ii) release from the interpled funds a total of \$33,319.60 to
8 Jaclyn for living expenses, past due real property tax due and owing, and travel expenses related
9 to G.H.’s medical treatment.

10 3. On February 12, 2018, the Court entered an order compelling the Parties’ counsel
11 to confer as soon reasonably possible in order to determine if an agreement could be worked out
12 regarding the relief requested within the Motion.
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14 4. The Court further ordered that any party(ies) desiring to file a response shall do so
15 by 3:00 p.m. on Friday, February 15, 2019, and Ms. Hafter may file a Reply by 5:00 p.m. on
16 Tuesday, February 19, 2019.

17 5. Pursuant to this Court’s order, and in an effort to provide the Parties with additional
18 time and opportunity to negotiate a long-term agreement for the living expenses pending the
19 resolution of the litigation, the Parties’ counsel have conferred and agreed to the following:

- 20 (a) The Clerk of the Court shall release from funds being held in Case No. 2:18-
21 cv-01166-APG-NJK a total of \$7,192.00 directly to Jaclyn R. Hafter within
22 5 days of entry of this order;
- 23 (b) The Clerk of the Court shall pay from funds being held in Case No. 2:18-
24 cv-01166-APG-NJK a total of \$10,143.60 directly to the Clark County
25 Treasurer’s Office, 500 S. Grand Central Parkway, PO BOX 551220, Las
26 Vegas, Nevada 89155, with reference to Parcel No. 138-16-312-025, within
27 5 days of entry of this order;

- (c) Jaclyn agrees to provide the government with a completed financial statement (Form 433) by March 1, 2019.
- (c) Any party desiring to file a response to the Motion shall file the same on or before Friday, March 15, 2019;
- (d) If Jaclyn wishes to file a reply to any response, such reply may be filed on or before Wednesday, March 20, 2019; and
- (e) The hearing on the Motion and any responsive pleading shall on the earliest date which is convenient for this Court.

Dated this 13th day of February, 2019.

/s/ Alexander G. LeVeque

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Attorney for Jaclyn R. Hafter

Dated this 13th day of February, 2019.

/s/ Cary C. Payne

CARY COLT PAYNE, ESQ.
Nevada Bar No. 4357
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*Attorney for Brandon Phillips,
Trustee of the Jacob Hafter Trust,
dated April 17, 2018*

Dated this 13th day of February, 2019.

/s/ Henry C. Darmstadter

HENRY C. DARMSTADTER, ESQ.
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Attorney for United States

1 **ORDER**

2 NOW THEREFORE, based upon the above stipulation between the Parties, this Court
3 enters its Orders and Decrees as follows:

4 **IT IS HEREBY ORDERED** that the Clerk of the Court shall release from funds being
5 held in Case No. 2:18-cv-01166-APG-NJK, a total of \$7,192.00 directly to Jaclyn R. Hafter
6 within 5 days of entry of this order;

7 **IT IS HEREBY FURTHER ORDERED** that the Clerk of the Court shall pay from funds
8 being held in Case No. 2:18-cv-01166-APG-NJK, a total of \$10,143.60 directly to the Clark
9 County Treasurer's Office, 500 S. Grand Central Parkway, PO BOX 551220, Las Vegas, Nevada
10 89155, with reference to Parcel No. 138-16-312-025, within 5 days of entry of this order;

11 **IT IS HEREBY FURTHER ORDERED** that any party desiring to file a response to the
12 Motion shall file the same on or before March 15, 2019;

13 **IT IS HEREBY FURTHER ORDERED** that if Jaclyn wishes to file a reply to any
14 response, such reply may be filed on or before Wednesday, March 20, 2019;

15 **IT IS HEREBY FURTHER ORDERED** that the hearing on the Motion to
16 Intervene CM/ECF #[31] shall be continued to Tuesday, March 26, 2019 at 9:00 a.m. in
17 Courtroom 6C.

18 Dated this 13th day of February, 2019.

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22 DISTRICT COURT JUDGE
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